



STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC UTILITY CONTROL

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February 25, 2000

Magalie Roman Salas
Commission Secretary
Federal Communications Commission
Portals II
445 12th Street, S.W.
Suite TW-A325
Washington, D.C. 20554

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96-98

Re: File No. NSD-L-99-102, Washington Utilities and Transportation
Commission's Petition for Delegation of Additional Authority to Implement
Number Conservation Methods

Dear Ms. Salas:

Enclosed please find one original and four copies of the Connecticut Department
of Public Utility Control comments filed in the above noted proceeding.

Sincerely,

DEPARTMENT OF PUBLIC UTILITY CONTROL

Louise Rickard

Louise Rickard
Acting Executive Secretary

Enc.

cc: Al McCloud (2)

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)
)
Washington Utilities and Transportation)
Commission's Petition for Delegation of Additional)
Authority to Implement Number Conservation Methods)

File No.
NSD-L-99-102

Implementation of the Local Competition Provisions)
of the Telecommunications Act of 1996)

CC Docket No.
96-98

COMMENTS OF THE CONNECTICUT
DEPARTMENT OF PUBLIC UTILITY CONTROL

Before the
FEDERAL COMMUNICATIONS COMMISSION
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COMMENTS OF THE CONNECTICUT
DEPARTMENT OF PUBLIC UTILITY CONTROL

I. Introduction

The Connecticut Department of Public Utility Control (CTDPUC) hereby files comments with the Federal Communications Commission (FCC or Commission) in the above noted proceeding in support of the Washington Utilities and Transportation Commission's (WUTC) Petition for Additional Delegated Authority to Implement Number Conservation Measures (Petition). Specifically, WUTC requests authority to: 1) Enforce number assignment standards, including auditing the use of numbering resources, and reclaiming unused and reserved area codes; 2) implement mandatory thousand number block pooling (TNP) trials using existing TNP software until later editions are available; 3) adopt interim number-assignment standards; 4) implement interim unassigned number porting (INUP); and 5) revise rationing procedures if necessary. WUTC states that it will use this additional authority to delay new

area codes in the 206, 425, 253, and 509 area codes and prolong the lives of new numbering plan areas (NPA), such as the 564 area code. Petition, pp. 1 and 2.

II. Discussion

On December 10, 1999, WUTC petitioned the Commission requesting that it be provided the authority to implement various area code conservation measures in the State of Washington. According to WUTC, Washington has a population of 5.8 million and currently has enough potential telephone numbers to supply each citizen with more than eight telephone numbers. WUTC also states that while there has been some increase in the demand for telephone numbers, the nation's telephone numbering system is becoming increasingly inefficient. In the opinion of WUTC, had the industry used telephone numbers with a modest level of efficiency, the recent introduction of new area codes in Washington would have satisfied consumer demand for many years. WUTC also indicates that it has recently been informed that two NPAs will require relief within two years. Therefore, in the absence of effective and enforceable national standards for the use of numbering resources, WUTC concludes that additional authority to implement number conservation methods commensurate with what the FCC has granted to other states is necessary. Petition, pp. 2 and 3.

CTDPUC supports the Petition and recommends that it be adopted by the Commission. WUTC has requested Commission authority to implement several area code conservation measures that it believes will address the state's existing number crisis. The Petition should be approved because WUTC is in a better

position to determine what is in the best interest of Washington. CTDPUc believes that these proposals when collectively implemented, should provide an orderly approach to assign telephone numbers in a more efficient manner and prolong the introduction of new NPAs in the State of Washington. CTDPUc notes that a number of WUTC's proposed conservation measures have been adopted and are in use in other jurisdictions. For example, WUTC has requested authority to implement mandatory thousand number block pooling trials. Authority to implement mandatory TNP trials has already been delegated to the States of New York, Massachusetts, California, Connecticut and Florida. WUTC has already concluded that the inefficient manner in which telephone numbers are assigned (i.e., in 10,000 blocks), is clearly the underlying factor creating the NPA shortage today. TNP trials would provide for a more efficient use of telephone numbers and minimize the wasteful allocation of these limited resources. WUTC should be afforded the same opportunity as was previously provided in the above noted states.

CTDPUC also supports WUTC's request for authority to enforce number assignment standards, including auditing the use of numbering resources, and reclaiming unused and reserved area codes. Clearly, enforcement of current number assignment standards is the first step towards providing for an efficient allocation of existing number resources. Auditing the use of numbering resources must also be permitted to ensure compliance with current industry guidelines and to determine that only those applicants with bona fide needs for additional numbering resources receive those numbers. Auditing is also

necessary to ensure that numbering resources are being used in an efficient and effective manner.

The Commission should also permit WUTC to reclaim unused codes or those codes that have not been placed into service within existing industry guidelines (Central Office Assignment Guidelines). Such authority would return numbers to the code inventory, thus delaying the introduction of new NPAs.

CTDPUC also supports WUTC's request to establish competitively neutral criteria for the acquisition and utilization of numbering resources. CTDPUC notes that WUTC has committed to working with the Commission and other state commissions to avoid imposing multiple, disparate number conservation regimes on carriers. WUTC's request should be approved. Petition, pp. 11 and 12.

Moreover, WUTC's request to implement interim unassigned number porting should likewise be approved. Based on CTDPUC's understanding, INUP has already been used by certain carriers during a rationing plan. Since these conservation measures have already been approved and implemented in other jurisdictions, WUTC should be afforded the same opportunity to implement these measures as was afforded in those jurisdictions. Delegation of such authority would allow WUTC to provide for a more efficient assignment of telephone numbers and reduce the confusion often associated with the introduction of new NXXs in Washington.

Finally, CTDPUC recommends that WUTC be provided with the ability to revise rationing procedures if necessary. According to WUTC, it will only implement such procedures as a last resort in the event that other number-

conservation measures are projected to be successful if given a few additional months to be fully implemented. CTDPUC believes that such revisions would minimize end user confusion that typically results from the introduction of new area codes.

III. Conclusion

WUTC has offered the Commission several area code optimization measures, that if adopted as proposed, would provide WUTC with the ability to slow the deployment of additional area codes and minimize the inconvenience, disruption and cost that is often associated with their implementation. Approval of the Petition will also provide WUTC with the flexibility to implement a number of optimization measures and provide it with the ability to impose stricter

requirements on those seeking codes requiring a more efficient use of the codes in their possession before additional ones are awarded. The Petition is in the public interest and should be adopted.

Respectfully submitted,

CONNECTICUT DEPARTMENT OF PUBLIC
UTILITY CONTROL

Donald W. Downes
Chairman

Glenn Arthur
Vice-Chairman

Jack R. Goldberg
Commissioner

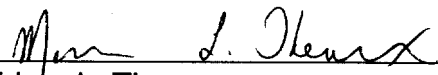
John W. Betkoski, III
Commissioner

Linda Kelly Arnold
Commissioner

February 28, 2000

Connecticut Department of
Public Utility Control
Ten Franklin Square
New Britain, CT 06051

CERTIFICATION



Miriam L. Theroux
Commissioner of the Superior Court